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Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave., SW. Room 4008
So., Ag Stop 20250
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Reference: Review of Fish Fertilizer with allowed synthetic substances
Point 7 Liquid Fish Products #205.601

Position: We urge you to continue to allow Fish Hydrolysate and Fish Emulsion (lowered to a pH of 3.5 with phosphoric acid or sulfuric acid as a stabilizer or pickling agent) as an approved input for organic crops.

Reason: Fish is the superior organic input fertilizer as it can be produced from 100% wild fish from the great lakes or from the oceans. However, fish needs to be stabilized or pickled to a pH of 3.5 with acid or it will putrefy. Phosphoric acid allows fish hydrolysate to be produced at an economical cost. As growers we can then afford to us fish hydrolysate for crop production. Phosphoric acid is an essential ingredient when producing fish hydrolysate from wild fish scraps.

Fish hydrolysate cannot be stabilized without lowering the pH to 3.5. Using feed grade phosphoric acid is nutritionally safe. Feed grade phosphoric acid is produced from rock phosphate, a natural mined material from our earth.

Thank you

Randall Willrett, Organic Farmer

RH Willrett